

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MF GLOBAL HOLDINGS
LIMITED SECURITIES LITIGATION

THIS DOCUMENT RELATES TO:

All Securities Actions
(*DeAngelis v. Corzine*)

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: Civil Action No. 1:11-CV-07866-VM
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: ECF CASE
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**NOTICE OF SETTLING PLAINTIFFS' MOTION FOR
(I) PRELIMINARY APPROVAL OF COMMERZ SETTLEMENT,
(II) CERTIFICATION OF THE COMMERZ SETTLEMENT CLASS, AND
(III) APPROVAL OF NOTICE TO THE COMMERZ SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement with Defendant Commerz Markets LLC dated as of March 17, 2015 (the "Commerz Stipulation")¹, attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiffs the Virginia Retirement System and Her Majesty The Queen In Right Of Alberta ("Lead Plaintiffs") and named plaintiff the Government of Guam Retirement Fund ("Guam" and, together with Lead Plaintiffs, the "Settling Plaintiffs"), on behalf of themselves, the other named plaintiffs in the Action, and the other members of the Commerz Settlement Class, hereby move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for an order: (i) preliminarily approving the proposed Commerz Settlement; (ii) certifying the proposed Commerz Settlement Class, certifying Guam as class representative for the Commerz Settlement Class, and appointing Co-Lead Counsel Bernstein Litowitz Berger & Grossmann LLP and Bleichmar Fonti Tountas & Auld LLP as class counsel for the Commerz Settlement Class;

¹ All capitalized terms used herein shall have the meanings provided in the Commerz Stipulation.

(iii) approving the form and manner of giving notice of the proposed Commerz Settlement to Commerz Settlement Class Members; and (iv) scheduling a hearing on final approval of the Commerz Settlement. Attached hereto as Exhibit 2 is the [Proposed] Order Preliminarily Approving Proposed Settlement with Commerz Markets LLC and Providing for Notice and its exhibits.

Dated: March 17, 2015
New York, New York

Respectfully submitted,

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